

July 12, 2012

Ex Parte Letter

The Honorable Julius Genachowski
The Honorable Robert McDowell
The Honorable Mignon Clyburn
The Honorable Jessica Rosenworcel
The Honorable Ajit Pai
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Reform – Mobility Fund, WT Docket No. 10-208

Dear Chairman Genachowski and Commissioners McDowell, Clyburn, Rosenworcel and Pai:

This letter is sent by over 650 telecommunications and advanced service providers identified below to ensure that the Federal Communications Commission (FCC) and our elected representatives in Congress have clear and unambiguous notice of our collective concerns with the “regression analysis”-based caps on Universal Service Fund (USF) support that were adopted in the FCC’s November 2011 “Transformation” Order and finalized in an order the Wireline Competition Bureau released in April 2012. We have heard from some corners that there must not be significant concerns with these caps due to the limited waivers filed to date. While we have many concerns beyond these caps with respect to the Order’s effect on rural consumers, we wish in this specific letter to dispel immediately and comprehensively any notion that rural, rate-of-return regulated incumbent local exchange carriers (RLECs), such as the hundreds of companies noted below, agree that these new caps comply with law, are workable for providers making long-term investment decisions in hard-to-serve areas, or will serve the interests of rural consumers.

By way of background, RLECs are committed carriers of last resort in their communities. Most of us are small businesses headquartered in the locations we serve. We are drivers of our local economies, significant employers in our small communities, and suppliers of the vital connections between rural areas and the wider world. Nearly all of us operate not only within the relatively populated boundaries of rural towns, but also across the sparsely populated surrounding regions. Those areas include national parks and forests, sites that supply critical energy resources, and the many ranches, farms, and other agribusiness operations that feed the United States and fulfill our nation’s role as the “breadbasket of the world.” We are companies and cooperatives formed to “fill the gaps” in areas left behind since the infancy of the Bell system, and we serve the vast expanses in our country where the business case for investing in networks and providing telecommunications services is limited, at best.

Congress has historically been well aware of the challenges associated with serving such areas, and therefore deemed it essential to include within the Telecommunications Act of 1996 a requirement that universal service support be predictable and sufficient. Unfortunately, the FCC's most recent "transformation" of the USF and related intercarrier compensation (ICC) mechanisms failed to determine what might constitute "sufficient" funding to achieve for universal service. Instead, the FCC concluded that current levels of USF funding—even with reductions in ICC revenues squeezed within them—should be adopted as a "budget" for USF going forward.

Although the insufficiency of support levels is of course a significant concern, this letter focuses more specifically on the unpredictability caused by the USF changes and the corresponding effect on current and future rural broadband deployment. In particular, the regression analysis framework provides no means for companies such as ours to determine how caps may change from year-to-year. This lack of predictability undermines our efforts to engage in responsible network planning. Many of us have retained paid experts (i.e., consultants who have worked for years, if not decades, on cost studies and cost models) who report that predicting the effects of the regression analysis on an individual company beyond one year or so is all but impossible. This impossibility arises because the regression analysis caps are not only based upon the acts or omissions of *every other* RLEC (or an unidentifiable subset of RLECs), but because the limits will be recalculated each year based upon acts and omissions of RLECs *two years prior to the recalculation*. This frustrates any opportunity for company managers to engage in the kind of long-term planning and investment decisions required in a capital-intensive business such as rural telecommunications. Moreover, this unpredictability, together with a concern that the "rules of the game" can change so easily midstream, also will hinder our ability to access capital on reasonable terms.

In short, the new rules compel companies to form capital budgets each year based upon what *other companies* did two years ago without knowing *how* the actions of others will affect recovery limits until it is too late to react or adjust given the long-term nature of the investments at issue and the fixed costs involved. Indeed, it is quite possible that one of us could do "next to nothing" in terms of network investments and *still* be caught by the caps two years later because everyone else did even less. Small businesses cannot run efficiently in the face of such uncertainty, and this uncertainty flies in the face of the statutory mandate of predictability.

We are a diverse group of companies serving diverse areas. Some of us are affected severely by the regression analysis caps today. Some of us are affected only slightly by the caps. Some of us are entirely unaffected by the caps as they stand currently. We may have different views on whether some capping mechanism is required and how it should be applied, if at all. However, we are united in our collective concern about the lack of transparency and pervasive unpredictability of these regression analysis caps. Those of us who are affected by the caps are still struggling to determine precisely why and how to avoid them going forward. Those of us who are unaffected by the caps are struggling to determine if they can be avoided going forward, and whether any investment or increased operations (such as additional maintenance efforts) will result in becoming "the next one to go."

Finally, the availability of waivers is of little, if any, comfort in this process. We have heard the FCC repeatedly cite the availability of waivers as a solution to seemingly every concern raised regarding USF reforms. However, after-the-fact waivers—which are determined at the discretion of FCC staff and can be obtained only after spending tens or hundreds of thousands of dollars to prepare applications and months of waiting for an answer—cannot substitute for a predictable and clearly defined USF mechanism that is established by appointed commissioners. Moreover, the FCC already warned in its transformation order that waivers will not be granted on a regular basis.

We recognize that the FCC must balance many interests and concerns in undertaking reform, and we do not minimize the challenges the FCC faced in doing so. But the FCC missed the mark in allowing staff to implement these regression analysis caps. Reform should achieve greater predictability rather than introducing new unpredictability. Reform should promote responsible rural broadband investment by giving clear rules of the road, rather than generating confusion that will only bring rural broadband investment and lending to a halt.

We have heard that the FCC's doors are always open for discussion regarding USF and ICC reform concerns. Please accept this letter from the hundreds of companies listed below, and please take prompt action to address the significant concerns raised by the regression analysis caps. We need clear rules that allow us to plan for and carry out rural broadband investment in lieu of a framework that keeps us guessing about whether to invest or not. Without such clear rules of the road, consumers in RLEC areas are at significant risk of being "frozen in time" as to the broadband they receive today—most of which is below the FCC's targeted 4/1 speed—and some consumers stand at risk of seeing broadband deteriorate or disappear altogether.

In closing, we hope again that you will not take our focus on the regression analysis caps in this letter as an indication that this is our only concern with respect to the order just adopted and further reforms still under consideration. We simply have focused on these caps to express a common set of concerns with respect to these caps across the industry.

Thank you for your attention to this correspondence on behalf of our companies. We look forward to a favorable response on behalf of the many rural residents and businesses we serve.

Sincerely,

3 Rivers Telephone Cooperative, Inc. (MT)
Accipiter Communications (AZ)
Adak Eagle Enterprises LLC d/b/a Adak Telephone
Utility (AK)
Adams Telephone Cooperative (IL)
Agate Mutual Telephone Cooperative Association
(CO)
Albion Telephone Company, Inc./ATC
Communications (ID)
Alenco Communications, Inc. (TX)
Alhambra-Grantfork Telephone (IL)
Alliance Communications Cooperative, Inc. (SD)
Alpine Communications, LC (IA)
Amelia Telephone Corp (VA)

Amherst Telephone Company (WI)
Arapahoe Telephone Company d/b/a ATC
Communications (NE)
Arcadia Telephone (OH)
Arctic Slope Telephone Association Cooperative
(AK)
Arizona Telephone (AZ)
ArkWest Communications (AR)
Armstrong Tel. of Maryland
Armstrong Tel. of New York
Armstrong Tel. of Pennsylvania
Armstrong Tel. of West Virginia
Arrowhead Communications Corp. (MN)
Arthur Mutual Telephone Company (OH)

Arvig (MN)
Asotin Telephone (WA)
Atlantic Telephone Membership Corp. (NC)
Ayrshire Farmers Mutual Telephone Company (IA)
B B & W Telephone, LLC (WI)
Baca Valley Telephone Company, Inc. (NM)
Badger Telecom, LLC (WI)
Baldwin Telecom, Inc. (WI)
Ballard Telephone Cooperative (KY)
Baraga Telephone Company (MI)
Barnardsville Telephone (NC)
Barnes City Cooperative Telephone Company (IA)
Bascom Mutual Telephone Company (OH)
Bay Springs Telephone Company Inc. (MS)
Bear Lake Telephone Company (UT)
Beaver Creek Cooperative Telephone Company (OR)
Beggs Telephone Co., Inc. (OK)
BEK Communications Cooperative (ND)
Belmont Telephone Company (WI)
Benkelman Telephone Co., Inc. (NE)
Ben Lomand Telephone Cooperative (TN)
Benton Cooperative Telephone Co. (MN)
Benton Ridge Telephone Company (OH)
Bergen Telephone Company (WI)
Bernard Telephone Co. (IA)
Big Bend Telephone Co. (TX)
Black Earth Telephone, LLC (WI)
Blanca Telephone Co. (CO)
Bloomingdale Communications (MI)
Blue Earth Valley Telephone (MN)
Blue Ridge Telephone (GA)
Blue Valley Tele-Communications (KS)
Bonduel Telephone, LLC (WI)
Border to Border Communications, Inc. (TX)
BPS Telephone Co (MO)
Brazoria Telephone Company (TX)
Brazos Telecommunications (TX)
Brazos Telephone Cooperative (TX)
Breda Telephone Corp. (IA)
Bretton Woods Telephone Company (NH)
Bridge Water Telephone (MN)
Bristol Bay Telephone Cooperative (AK)
Bruce Telephone Company (MS)
Buggs Island Telephone Cooperative (VA)
Burkes Garden Telephone Co. (VA)
Bush Tell, Inc. (AK)
Butler Telephone (AL)
Calhoun City Telephone (MS)

Cal-Ore Telephone Company (CA)
Calaveras Telephone Company (CA)
Cambridge Telephone Company, Inc. (ID)
Camden Telephone (IN)
Camden Telephone & Telegraph (GA)
Canadian Valley Telephone Company (OK)
Canby Telephone Association (OR)
Cannon Valley Telephone (MN)
Cap Rock Telephone Cooperative, Inc. (TX)
Cascade Communications Company (IA)
Cascade Utilities (OR)
Cassadaga Telephone Company (NY)
Cass Telephone Company (IL)
CC Communications, Inc. (NV)
Central Montana Communications (MT)
Central Oklahoma Telephone Company (OK)
Central Scott Telephone Company (IA)
Central State Telephone, LLC (WI)
Central Texas Telephone Cooperative Inc. (TX)
Central Utah Telephone, Inc. (UT)
Champlain Telephone Company (NY)
Chariton Valley Telephone Corporation (MO)
Chatham Telephone (MI)
Cherokee Telephone Company (OK)
Cheyenne River Sioux Tribe Telephone Authority (SD)
Chibardun Telephone Coop. - dba Mosaic Telecom (WI)
Chicamagua Telephone Company (GA)
Chickasaw Telephone Company (OK)
Chillicothe Telephone Co. (OH)
Chippewa County Telephone Company (MI)
Christensen Communications Company (MN)
Circle Telephone & Electric, LLC (AK)
Citizens Telephone Co. (MO)
Citizens Telephone Cooperative, Inc. (VA)
Citizens Telephone Cooperative, Inc. (WI)
Citizens Telephone Corporation (IN)
Clara City Telephone Company (MN)
Clear Creek Communications (OR)
Clear Lake Independent Telephone Co. (IA)
Cleveland County Tel. (AR)
Cobbosseecontee Telephone Co. (ME)
Cochrane Telephone Cooperative (WI)
Coleman County Telephone Coop. (TX)
Colo Telephone Company (IA)
Colton Telephone Company d/b/a Coltontel (OR)
Columbine Telephone Co. (WY)

Columbus Telephone (KS)
Comm Corp of Indiana
Comm Corp of Michigan
Comm Corp of So Indiana
Communications 1 Network, Inc. (IA)
Community Telephone Co. (TX)
ComSouth (GA)
Concord Telephone (TN)
Consolidated Telcom (ND)
Consolidated Telecommunications Co. (MN)
Continental Telephone (OH)
Coon Valley Farmers Telephone Company, Inc. (WI)
Cooperative Telephone Exchange (IA)
Copper Valley Telephone Cooperative, Inc. (AK)
Cordova Telephone Cooperative (AK)
Corn Belt Telephone (IA)
Council Grove Telephone (KS)
Craigville Telephone Co. (IN)
Crockett Telephone Company (TN)
Crossville Telephone Company (IL)
Crosslake Communications (MN)
Craw-Kan Telephone (KS)
Cuba City Telephone Exchange Company (WI)
Cumby Telephone Cooperative (TX)
Cunningham Telephone & Cable (KS)
Custer Telephone Cooperative, Inc. (ID)
Dakota Central Telecommunications Cooperative (ND)
Dakota Central Telecom I, Inc. (ND)
Dalton Telephone, Inc. (NE)
Danville Mutual Telephone Co. (IA)
Darien Telephone Co. (GA)
Daviess-Martin RTC (IN)
Decatur Telephone (AR)
Decatur Telephone Company (MS)
Deerfield Farmers' Telephone Company (MI)
Delhi Telephone Company (NY)
Dell Telephone Cooperative (TX)
Delta County Tele-Comm (CO)
Deposit Telephone (NY)
Dickey Rural Telephone Cooperative (ND)
Dickeyville Telephone Corp, LLC (WI)
Diller Telephone Company (NE)
Direct Communications Cedar Valley (ID)
Direct Communications Rockland (ID)
Dixville Telephone Co. (NH)
Doylestown Telephone Company (OH)
DTC Communications (TN)

Ducor Telephone Co. (CA)
Dumont Telephone Company (IA)
Dunbarton Telephone Co. (NH)
Dunkirk & Fredonia Telephone Company (NY)
Duo County Telephone Cooperative (KY)
Eagle Telephone Systems (OR)
Eagle Valley Telephone Co. (MN)
East Ascension Telephone Co. LLC (LA)
EastCoast Telecom, LLC (WI)
Eastern Slope Rural Telephone Association, Inc. (CO)
Eckles Telephone Company (MN)
Edwards Telephone (NY)
Egyptian Telephone Cooperative Association (IL)
Ellerbe Telephone Company (NC)
Ellijay Telephone Company (GA)
Ellington Telephone Company (MO)
Elsie Communications, Inc. (NE)
Emily Cooperative Telephone Company (MN)
Endeavor Communications (IN)
Enhanced Telecommunications Corp. (IN)
ENMR Telephone Cooperative (NM)
E. Ritter Telephone Co. (AR)
ETEX Telephone Cooperative (TX)
Faith Municipal Telephone Company (SD)
Farber Telephone Co (MO)
Farmers Cooperative Telephone Company (IA)
Farmers Mutual Telephone Coop (IA)
Farmers Mutual Telephone Co. (IA)
Farmers Mutual Telephone Company (MN)
Farmers Mutual Telephone Company (OH)
Farmers Telephone Co. (IA)
Farmers Telephone Co., LLC (WI)
Farmers Tel. Coop. (SC)
Farmers Telecommunications Cooperative, Inc. (AL)
Federated Telephone Cooperative (MN)
Felton Telephone Co. (MN)
Fenton Cooperative Telephone Company (IA)
Five Area Telephone Cooperative (TX)
Fidelity Communications Co. (MO)
Filer Mutual Telephone Co. (ID)
Flat Rock Telephone Co-Op., Inc. (IL)
Foothills Rural Telephone Cooperative Corporation (KY)
Foresthill Telephone Co. (CA)
Fort Mojave Telecommunications, Inc. (AZ)
Franklin Telephone Co. (VT)
Ft. Randall Telephone Company (MN)
Fulton Telephone Company (MS)

Ganado Telephone Co. (TX)
Garden Valley Telephone Company (MN)
Gardenville Cooperative Telephone Association (MN)
Geetingsville Telephone Co. (IN)
Georgetown Telephone Company (MS)
Germantown Telephone Co. (NY)
Gervais Telephone Company (OR)
Glandorf Telephone Company, Inc. (OH)
Glenwood Telephone Company (GA)
Glenwood Telephone Membership Corporation (NE)
Golden Belt Telephone Company/GBT Communications (KS)
Golden West Telecommunications Cooperative (SD)
Gorham Telephone Co. (KS)
Grafton Telephone Co. (IL)
Granada Telephone Co. (MN)
Granby Telephone Co. (MO)
Grand River Mutual Telephone Corp. (MO)
Granite State Telephone, Inc. (NH)
Grantland Telecom (WI)
Green Hills Telephone Corporation (MO)
Griggs County Telephone Company (ND)
Guadalupe Valley Telephone Cooperative (TX)
H&B Communications, Inc. (KS)
Hager TeleCom, Inc. (WI)
Halstad Telephone Co. (MN)
Hamilton County Telephone Co-Op (IL)
Hampden Telephone Co. (ME)
Hanson Communications (MN)
Happy Valley Telephone (CA)
Hardy Telecommunications, Inc. (WV)
Harrisonville Telephone Company (IL)
Hartington Telephone Co. (NE)
Hartland & St. Albans Telephone Co. (ME)
Hart Telephone Company (GA)
Hartman Telephone Exchanges, Inc. (NE)
Haviland Telephone Co. (KS)
Heart of Iowa Communications Cooperative (IA)
Hemingford Cooperative Telephone Co. (NE)
Henderson Cooperative Telephone Company d/b/a Mainstay Communications (NE)
Hiawatha Telephone Company (MI)
Highland Telephone Cooperative (TN)
Highland Telephone Cooperative (VA)
Hill Country Telephone Cooperative (TX)
Hinton Telephone Co. (OK)
Hollis Telephone Co. (NH)

Home Pittsboro Telephone (IN)
Home Telephone Co. (IL)
Home Telephone (OR)
Home Telephone Company dba Home Communications (KS)
Home Telephone Company (SC)
Home Waldron Telephone (IN)
Hooper Telephone Co. (NE)
Hopi Telecommunications Inc., (AZ)
Hornitos Telephone (CA)
Horry Telephone Cooperative, Inc. (SC)
Humphreys Co. Telephone (TN)
Hutchinson Telephone Co. (MN)
Huxley Communications Cooperative (IA)
Indianhead Telephone Company (WI)
Industry Telephone Company (TX)
InterBel Telephone Cooperative (MT)
Inter-Community Telephone Co., LLC (ND)
Interior Telephone Company (AK)
Interstate-35 Communications (IA)
Interstate Telecommunications Cooperative, Inc. (SD)
Island Telephone Co. (ME)
Island Telephone (MI)
James Valley Telecommunications (SD)
JBN Telephone Company (KS)
Jefferson Telephone Co. (IA)
Kalida Telephone Company (OH)
Kalona Cooperative Telephone Company (IA)
KanOkla Networks (KS/OK)
Kaplan Telephone Company (LA)
Kearsarge Telephone Co. (NH)
Kerman Telephone Co. (CA)
Keystone Arthur Telephone C.O. (NE)
Kingdom Telephone Co. (MO)
KPU Telecommunications (AK)
Lackawaxen Telecommunications Services (PA)
Lafourche Telephone Co. (LA)
LaHarpe Telephone Company, Inc. (IL)
Lakefield Telephone Company (WI)
Lakeside Telephone Co. (MS)
La Porte City Telephone Company (IA)
Lathrop Telephone Company (MO)
Laurel Highland Telephone Co. (PA)
La Valle Telephone Coop. (WI)
La Ward Telephone Exchange, Inc. (TX)
Lehigh Valley Coop Telephone Association (IA)
Lemonweir Valley Telcom (WI)

Lennon Telephone Company (MI)
Leslie County Telephone (KY)
Lewis River Telephone (WA)
Lewisport Telephone (KY)
Lincolnvill Telephone Company (ME)
Little Miami Comm Corp (OH)
Logan Telephone Cooperative (KY)
Lone Rock Cooperative Telephone Company (IA)
Loretel Systems, Inc. (MN)
Loretto Telephone Company (TN)
Lost Nation-Elwood Telephone (IA)
Ludlow Telephone Co. (VT)
M & M Telephone (PA)
McClellanville (SC)
McDaniel Telephone (WA)
McDonough Telephone Cooperative (IL)
Mabel Cooperative Telephone Company (MN)
Madison Telephone Co. (IL)
Madison Telephone (KS)
Madison Communications, Inc. (GA)
Manawa Telephone Company, Inc. (WI)
Mark Twain Rural Telephone Co. (MO)
Marne & Elk Horn Telephone Company (IA)
Marquette-Adams Telephone Cooperative (WI)
Matanuska Telephone Association, Inc. (AK)
Medicine Park Telephone Co. (OK)
Merchants & Farmers (IN)
Merrimack County Telephone Co. (NH)
Mescalero Apache Telecom, Inc. (NM)
Michigan Central Broadband Company (MI)
Mid America Telephone Co. (OK)
Mid-Century Telephone Cooperative (IL)
Middleburgh Telephone Co. (NY)
Mid Maine Telecom (ME)
Mid-Plains, LLC (WI)
Mid-Plains Rural Telephone Coop. (TX)
Mid-Rivers Telephone Cooperative dba Mid-Rivers Communications (MT)
Midstate Communications, Inc. (SD)
Mid-State Telephone (MN)
Midvale Telephone Exchange, Inc. (ID)
Midway Telephone Company (MI)
Midway Telephone, LLC (WI)
Millry Communications (AL)
Minburn Telephone Company (IA)
Minburn Telecommunications, Inc. (IA)
Minerva Valley Telephone Company (IA)
Modern Cooperative Telephone Co. (IA)

Molalla Communications (OR)
Monon Telephone Co. (IN)
Monroe Telephone Company (OR)
Montrose Mutual Telephone Co., Inc. (IL)
Moore & Liberty Telephone Company (ND)
Mosinee Telephone Company, LLC (WI)
Moultrie Independent Telephone Company (IL)
Mound Bayou Telephone Company (MS)
Moundridge Telephone Co. (KS)
Moundville Telephone Company (AL)
Mountain Rural Telephone Cooperative (KY)
Mountain View Telephone Co. (AR)
Mount Horeb Telephone Company (WI)
Mt. Vernon Telephone, LLC (WI)
MTC Technologies (IA)
Mutual Telephone Co. (IA)
Mutual Telephone Co. (KS)
Mukluk Telephone Company (AK)
Mulberry Cooperative Telephone Co. (IN)
Myrtle Telephone (MS)
National (AL)
Nelson Ball Ground (GA)
Nelson Telephone Cooperative (WI)
Nemont Telephone Cooperative (MT)
New Castle (VA)
New Florence Telephone Corp. (MO)
New Hope Telephone Cooperative (AL)
New Lisbon Telephone Company (IN)
New London Telephone (WI)
Newport Telephone Co. (NY)
New Windsor Telephone Company, Inc. (IL)
Niagara Telephone Company (WI)
Nicholville Telephone Co., Inc. (NY)
NineStar Connect (IN)
Nortex Communications (TX)
North Central Telephone Cooperative (TN)
North Dakota Telephone Company (ND)
Northeast Iowa Telephone Company (IA)
Northeast Louisiana Telephone Co. (LA)
Northeast Missouri Rural Telephone Co. (MO)
Northern Arkansas Telephone Company (AR)
Northern Iowa Telephone Co, (IA)
Northern Telephone Cooperative (MT)
Northfield Telephone Co. (VT)
North State Telephone Company (OR)
North Texas Telephone Company (TX)
Northwest Communications Cooperative (ND)
Northwestern Indiana Telephone Company (IN)

Northwest Telephone Cooperative Association (IA)
Norvado (WI)
Norway Telephone (SC)
Nucla-Naturita Telephone Company (CO)
NU-New Ulm (MN)
Nunn Telephone Company (CO)
Oakman Telephone (AL)
Ogden Telephone Company (IA)
Oklahoma Communications Systems, Inc. (OK)
Oklatel Communications (TX)
Olin/Morley Telephone Co. (IA)
Ontonagon County Telephone Company (MI)
Oran Mutual Telephone Company (IA)
Orchard Farm Telephone (MO)
Oregon Farmers Mutual Telephone Co. (MO)
Oregon Farmers (MO)
Oregon-Idaho Utilities, Inc. (ID)
Oregon Telephone Corporation (OR)
Oriskany Falls Telephone (NY)
OTZ Telephone Cooperative, Inc. (AK)
Palmer Mutual Telephone Company (IA)
Panhandle Telephone Cooperative (OK)
Panora Communications Cooperative (IA)
Partner Communications Cooperative (IA)
Paul Bunyan Communications (MN)
Pembroke Telephone Company (GA)
Pembroke Telephone Cooperative (VA)
Penasco Valley Telecommunications (NM)
Peoples Telecommunications LLC (TN)
Peoples Telecommunications LLC (KS)
Peoples Telephone Cooperative (KY)
Peoples Telephone (AL)
People's Telephone Co (OR)
Peoples Telephone Co. (IA)
Perkinsville Telephone Co. (VT)
Perry-Spencer RTC d/b/a PSC (IN)
Phillips County Telephone Company (d/b/a PC
Telcom) (CO)
Piedmont Rural Telephone Cooperative (SC)
Pine Belt Telephone Co. Inc. (AL)
Pine Drive Telephone (CO)
Pine Island Telephone Co. (MN)
Pine Telephone Systems, Inc. (OR)
Pine Tree Telephone and Telegraph Co. (ME)
Pinnacle Communications (OK)
Pioneer Communications (KS)
Pioneer Telephone Cooperative, Inc. (OK)
Pioneer Telephone Cooperative (OR)

Plainview Telephone Co., Inc. (NE)
Poka Lambro Telephone Cooperative (TX)
Polar Communications (ND)
Port Byron Telephone (NY)
Potlatch/Troy Telephone (ID)
Prairie Telephone Co., Inc. (IA)
Preston Telephone Co. (IA)
Price County Telephone Company (WI)
Project Mutual Telephone Cooperative Association,
Inc. (ID)
Public Service Telephone Company (GA)
Pulaski White Rural Telephone Cooperative (IN)
Quincy Telephone (FL)
Radcliffe Telephone Co. (IA)
Rainbow Telecommunications (KS)
Randolph Telephone Membership Corporation (NC)
Range Telephone Cooperative, Inc. (MT)
RC Communications (SD)
Red River Rural Telephone Association (ND)
Reservation Telephone Cooperative (ND)
Reynolds Telephone Company (IL)
Richland-Grant Telephone Coop. (WI)
Ringgold Telephone Company (GA)
Rio Virgin Telephone Company (NV)
Riverside Telecom, LLC (WI)
River Valley Telecommunications Coop. (IA)
Roanoke Telephone Company, Inc. (AL)
Roberts County Telephone Coop. Assoc. (SD)
Rochester Telephone Co. (IN)
Rock Port Telephone Co. (MO)
Roggen Telephone (CO)
Royal Telephone Co. (IA)
RT Communications (WY)
RTC Communications (IN)
Rural Telecom Inc. (ID)
Rural Telephone Service Company, Inc. (KS)
Rye Telephone Co. (CO)
S & A Telephone Company (KS)
S & T Telephone Cooperative Association (KS)
S & W Telephone Company (IN)
Sac County Mutual Telephone Company (IA)
Saco River Telephone and Telegraph Co. (ME)
Sacred Heart Telephone Company (MN)
Salem Telephone (KY)
Salina-Spavinaw Telephone Co., Inc. (OK)
Saluda Mountain Telephone NC)
San Carlos Apache Telecommunications Utility, Inc.
(SCATUI) (AZ)

Sandhill Telephone Cooperative (SC)
Santa Rosa Telephone Cooperative, Inc. (OK/TX)
Scandinavia Telephone (WI)
Scio Mutual Telephone Association (OR)
Scott County Telephone Cooperative (VA)
SE Mississippi Telephone
Service Telephone (NC)
Sharon Telephone Company (WI)
Shiawasee Telephone (MI)
Shoreham Telephone, LLC (VT)
Sierra Telephone Co. (CA)
Silver Star Communications (WY)
Siren Telephone Company (WI)
Siskiyou Telephone Company (CA)
SkyLine Membership Corporation (NC)
SkyLine Telecom (WA)
Skyline Telephone Company (UT)
Sledge Telephone Company (MS)
Sleepy Eye Telephone Co. (MN)
Smithville Telephone Company (IN)
Solarus (formerly Wood County Telephone Company) (WI)
Somerset Telephone Co. (ME)
South Arkansas Telephone Co. (AR)
South Caanan Telephone Company (PA)
South Central Telephone Association, Inc. (KS/OK)
Southeastern Indiana Rural Telephone Cooperative (IN)
Southeast Nebraska Communications (NE)
South Plains Telephone Cooperative, Inc.(TX)
Southeast Telephone, LLC (WI)
Southern Kansas Telephone (KS)
Southern Montana Telephone Company (MT)
South Park Telephone Co. (CO)
South Slope Cooperative Communications (IA)
Southwestern Telephone (AZ)
Southwest Oklahoma Telephone Company (OK)
Southwest Telephone Exchange (IA)
Springport Telephone Co. (MI)
Springville Co-operative Telephone Assn, Inc. (IA)
Spruce Knob Seneca Rocks Telephone Company (WV)
Starbuck Telephone Company (MN)
Star Telephone Membership Corporation (NC)
State Long Distance (WI)
Stayton Cooperative Telephone Company (OR)
Steelville Telephone Exchange (MO)
Stockbridge & Sherwood (WI)

Stockholm-Strandburg Telephone Company (SD)
Stoutland Telephone (MO)
St. Paul Cooperative Telephone Association (OR)
St. Stephen Telephone (SC)
Strasburg Telephone Company (CO)
Stratford Mutual Telephone Company (IA)
Sugar Valley Telephone (PA)
Sully Telephone Association (IA)
Surry Telephone Membership Corporation (NC)
Swayzee Telephone Company (IN)
Swiftel Communication (Brookings) (SD)
Table Top Telephone Co. (AZ)
Taylor Telephone Cooperative, Inc. (TX)
TDS Telecommunications Corp. (WI)
Telephone Service Company (MN)
Tellico Telephone (TN)
Templeton Telephone Company (IA)
Tenney Telephone, LLC (WI)
Terral Telephone Company (OK)
Terril Telephone Cooperative (IA)
The Easton Telephone Company (MN)
The Island Telephone (ME)
The North-Eastern Pennsylvania Tel. Co. (PA)
The Ottoville Mutual Telephone Company (OH)
The Ponderosa Telephone Co. (CA)
The Toledo Telephone Co., Inc (WA)
Tidewater Telecom (ME)
Tipton Telephone (IN)
Titonka Telephone Company (IA)
Tn Telephone (TN)
Tohono O'odham Utility Authority (AZ)
Topsham Telephone Co. (VT)
Totah Communications, Inc. (OK/KS)
Totalcom Communications (TX)
Township Telephone (NY)
Trans-Cascades Telephone Company (OR)
Trenton Telephone Co. (GA)
Triangle Telephone Cooperative (MT)
Tri-County Communications Coop. (WI)
Tri-County Telephone (IN)
Tri-County Telephone (KS)
Tri-Country Telephone Co. (AR)
Tri County Telephone (WY)
Tri-County Telephone Membership Corporation (NC)
TrioTel Communications, Inc. (SD)
Tularosa Basin Telephone Company (NM)
Turtle Mountain Communications (ND)

Twin Lakes Telephone Cooperative Corporation (TN)	West Liberty Telephone Company (d/b/a Liberty Communications) (IA)
Twin Valley Telephone (KS)	West Penobscot Telephone Co. (ME)
Union Telephone Co. (NH)	West Plains Telecommunications (TX)
Union Telephone Company (WI)	West Point Telephone Company, Inc (IN)
United Telephone Assn, Inc. (KS)	West River Telecommunications Cooperative (ND)
United Telephone Mutual Aid Corporation (ND)	West Tennessee Telephone Company (TN)
Unitel (IL)	Western New Mexico Telephone Co., Inc. (NM)
Unitel, Inc. (ME)	Western Telephone Co. (SD)
Upper Peninsula Telephone Company (MI)	Westgate Communications dba WeavTel (WA)
Upsala Cooperative Telephone Assn. (MN)	Westphalia Telephone Co. (MI)
Utelco, LLC (WI)	Westside Independent Telephone Company (IA)
Valley Telecommunications Cooperative Assoc., Inc. (SD)	Wes-Tex Telephone Cooperative (TX)
Valley Telephone Cooperative, Inc. (AZ)	West Texas Rural Telephone Cooperative (TX)
Valley Telephone Cooperative (TX)	West Wisconsin Telcom Cooperative (WI)
Van Buren Telephone Company, Inc., (IA)	Wheat State Telephone (KS)
Vanlue Telephone (OH)	Wiggins Telephone Association (CO)
Venture Communications Cooperative (SD)	Wilkes Telecommunications (NC)
Ventura Telephone Co. (IA)	Williston Telephone (SC)
Vermont Telephone Co. Inc. (VT)	Wilson Telephone Co. (KS)
Vernon Telephone (NY)	Wilton Telephone Co. (NH)
Vernon Telephone Coop (WI)	Winnebago Cooperative Telecom Association (IA)
Virginia Telephone (VA)	Winsted Telephone (MN)
Volcano Telephone Company (CA)	Winterhaven Telephone (CA)
Wabash Telephone Coop., Inc. (IL)	Wittenberg Telephone Company (WI)
Waitsfield-Fayston Telephone Co., Inc. (VT)	Wolverine Telephone (MI)
Wamego Telecommunications Co. (KS)	Woodstock Telephone Co. (MN)
Warm Springs Telecom (OR)	Woolstock Mutual Telephone (IA)
Warren Telephone Co. (ME)	Wyandotte Telephone Co. (OK)
Waunakee Telephone, LLC (WI)	Wyoming Mutual Telephone Co. (IA)
Wauneta Telephone Co., Inc. (NE)	XIT Rural Telephone Cooperative, Inc. (TX)
Waverly Hall Telephone LLC (GA)	Yadkin Valley Telephone Membership Corporation (NC)
Webb-Dickens Telephone Corp (IA)	Yelcot Telephone Co. (AR)
Webster-Calhoun Cooperative Telephone Association (IA)	Yukon Telephone Company (AK)
West Carolina Rural Telephone Cooperative (SC)	Yukon-Waltz Telephone Co. (PA)
West Iowa Telephone Co. (IA)	Yucca Telecom (NM)
West Kentucky and Tennessee Telecommunications Cooperative (KY & TN)	Zona Communications (AZ)
	Zenda Telephone Co. (KS)
	Zumbrota Telephone Company (MN)